## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

GREGORY V. MANCO Ph.D..

**CIVIL ACTION** 

Plaintiff, v.

NO. 5:22-cv-00285-JLS

ST. JOSEPH'S UNIVERSITY, et al.,

Defendants.

## **STIPULATION FOR EXTENSION OF TIME**

WHEREAS, certain Defendants' responses to the Amended Complaint are currently due by September 7, 2022;

WHEREAS, the two newly-named Defendants, Dr. Cheryl McConnell and Corrine McGrath, have agreed to execute waivers of service, thereby making their responses to the Amended Complaint due 60 days thereafter; and

WHEREAS, the parties seek to proceed as efficiently as possible.

It is hereby stipulated by the parties, pursuant to Local Rule 7.4 and consistent with Rule 15(a)(3), that all Defendants shall answer, move, or otherwise plead in response to Plaintiff's Amended Complaint by Monday, October 31, 2022, to align with the anticipated deadlines for the two newly-named Defendants, Dr. Cheryl McConnell and Corrinne McGrath.

/s/ Scott Zlotnick Scott Zlotnick, Esquire Zarwin Baum DeVito Kaplan Schaer Toddy, P.C. One Commerce Square 2005 Market Street, 16th Floor Philadelphia, PA 19103 7042

Attorneys for Plaintiff

/s/ Leslie Miller Greenspan Leslie Miller Greenspan, Esquire Tucker Law Group, LLC Ten Penn Center 1801 Market Street, Suite 2500 Philadelphia, PA 19103

Attorneys for Defendants, Saint Joseph's University & Dr. Cheryl McConnell

DRAFT

/s/ Deniz Uzel Reilly
Deniz Uzel Reilly, Esquire
Fisher & Phillips LLP
Two Logan Square
12th Floor
100 N. 18th Street
Philadelphia, Pennsylvania 19103

Attorneys for Defendants Hadassah Colbert, Kiernan Loue, Karleigh Lopez, Erin Fahey, & Corrine McGrath

/s/ Robert C. Drake
Robert C. Drake, Esquire
Drake Speciale LLC
221 Chestnut St. - Suite 200
Philadelphia, Pennsylvania 19106

Attorneys for Defendant Dr. Susan Liebell

Dated: September 1, 2022

BY THE COURT:

<u>/s/ Jeffrey L. Schmehl</u> Jeffrey L. Schmehl, J. /s/ Kristen E. Lizzano
Kristen E. Lizzano, Esquire
March, Hurwitz & DeMarco
Providence Center
1100 N. Providence Road
Media, Pennsylvania 19063

Attorneys for Defendant Lynly Carman